

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Zimmer Biomet Holdings, Inc.,

Plaintiff,

v.

Mary N. Insall, as Executrix of
The Estate of John N. Insall,

Defendant.

Case No. 1:22-cv-2575

Hon. Franklin U. Valderrama

ZIMMER BIOMET’S MOTION FOR VACATUR OF ARBITRATION AWARD

Plaintiff Zimmer Biomet Holdings, Inc. (“Zimmer Biomet”) moves under 9 U.S.C. § 10 to vacate paragraphs 1 & 2 of the March 8, 2022 arbitration award issued in Case No. 02-12-0001-4010 before the American Arbitration Association, Commercial Arbitration Tribunal. For the reasons set forth in Zimmer Biomet’s accompanying Memorandum of Law and Statement of Undisputed Facts, Zimmer Biomet respectfully requests that the Court (i) grant its motion; (ii) enter judgment in Zimmer Biomet’s favor; (iii) deny the request by Mary N. Insall, as Executrix of The Estate of John N. Insall (“the Estate”), for confirmation of the arbitration award; and (iv) deny the Estate’s alternative request for remand to arbitration to consider alternative recovery theories.

Dated: August 15, 2022

Respectfully submitted,

By: /s/ Wan-Shon Lo

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was filed and served via the CM/ECF system on August 15, 2022, upon all counsel of record.

/s/ Shon Lo
Shon Lo